



RAINIER BRAND APPLES

ZIRKLE FRUIT COMPANY

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ORGANIC PROGRAM

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Arthur Neal
Director, Program Administration
National Organic Program
USDA-AMS-TMO-NOP
1400 Independence Ave., SW. Room 4008
So., Ag Stop 0268
Washington, DC 20250

Email: National.List@usda.gov

Fax: (202) 205-7808

Dear Mr. Neal and National Organic Standards Board:

This letter is in reference to the National Organic Program, Sunset review, Docket number TM-04-07. Zirkle Fruit Company supports the allowance of the following substance:

Lime Sulfur (Calcium Polysulfide), and hydrated lime and elemental sulfur from section 205.601 (e) and (i). Hydrated lime and elemental sulfur are used in the production of Lime Sulfur Solution. Lime sulfur is an essential product in our operation as an insecticide and fungicide on all our acres of organic apples, pears, and cherries.

This product has Organic Materials Review Institute approval and has been used by large and small growers. Lime sulfur is the primary tool we have to control rust mite and powdery mildew, and in some cases it is the only available product organic growers have to control certain pests. Lime sulfur has been used successfully for about 200 years with no recorded form of resistance.

Sincerely,

Philip C. Hull
Facilities Manager



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